

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In re BLACKROCK MUTUAL FUNDS
ADVISORY FEE LITIGATION

Master File No. 3:14-cv-01165-FLW-TJB

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING DISCOVERY DEADLINES

WHEREAS, on May 20, 2015, the Court entered a Scheduling Order (Dkt. No. 66) establishing deadlines for fact and expert discovery in this action;

WHEREAS, pursuant to the Scheduling Order, the deadline for the parties to complete fact discovery is May 19, 2016;

WHEREAS, substantial discovery remains to be completed and cannot reasonably be completed by the current deadline of May 19, 2016;

WHEREAS, the parties have met and conferred regarding the discovery remaining to be completed and a schedule for completing such discovery;

WHEREAS, in view of the discovery remaining to be completed, the parties have agreed to extend the fact discovery deadline by 8 months from May 19, 2016 to January 19, 2017;

WHEREAS, this is the first request for an extension of the fact discovery deadline in this action; and

WHEREAS, the resulting 20-month period for fact discovery is in accordance with what has been required to complete fact discovery in other recent cases in this District involving claims under Section 36(b) of the Investment Company Act of 1940 (*see Kasilag v. Hartford Inv. Fin. Servs., LLC*, No. 11-cv-1083 (RMB) (KMW) (D.N.J.) (22 months of fact discovery);

Sivolella v. AXA Equitable Life Ins. Co., No. 11-cv-4194 (PGS) (DEA) (D.N.J.) (18 months of fact discovery));

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the parties through their undersigned counsel and subject to the Court's approval, as follows:

1. The parties shall have until January 19, 2017 to complete fact discovery in this action.

2. All other deadlines set forth in the Scheduling Order remain in effect.

3. *Telephone Conferences set See [See DE # 66]*

Dated: April 27, 2016

Dated: April 27, 2016

By: /s/ Robert L. Lakind

Robert L. Lakind

Arnold C. Lakind

Daniel S. Sweetser

Mark A. Fisher

SZAFERMAN, LAKIND, BLUMSTEIN,
& BLADER, PC

101 Grovers Mill Road
Suite 200

Lawrenceville, New Jersey 08648
(609) 275-0400

alakind@szaferman.com

rlakind@szaferman.com

dsweetser@szaferman.com

mfisher@szaferman.com

Robin F. Zwerling

Jeffrey C. Zwerling

Susan Salvetti

Andrew W. Robertson

ZWERLING, SCHACHTER &
ZWERLING, LLP

41 Madison Avenue

New York, New York 10010

(212) 223-3900

rzwerling@zsz.com

jzwerling@zsz.com

ssalvetti@zsz.com

By: /s/ Andrew Muscato

Andrew Muscato

Seth M. Schwartz

SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

(A Delaware Limited Liability Partnership)

4 Times Square

New York, New York 10036

(212) 735-3000

Andrew.Muscato@skadden.com

Seth.Schwartz@skadden.com

Eben P. Colby

SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

500 Boylston Street

Boston, Massachusetts 02116

617-573-4800

Eben.Colby@skadden.com

Donald A. Robinson

Justin T. Quinn

Keith J. Miller

ROBINSON MILLER LLC

One Newark Center

19th Floor

Newark, New Jersey 07102

(973) 446 -2760

arobertson@zsz.com

Stephen J. Oddo
Jenny L. Dixon
Edward B. Gerard
ROBBINS ARROYO LLP
600 B Street, #1900
San Diego, California 92101
(619) 525-3990
soddo@robbinsarroyo.com
jdixon@robbinsarroyo.com
egerard@robbinsarroyo.com

Counsel for Plaintiffs

drobinson@rwmlegal.com
jquinn@rwmlegal.com
kmiller@rwmlegal.com

Counsel for Defendants

IT IS SO ORDERED.

Dated: April 29, 2016


HON. TONIANNE J. BONGIOVANNI
United States Magistrate Judge

* Plaintiff shall initiate the telephone conferences
a) July 12, 2016 at 1030
and b) September 13, 2016 at 3pm.
Agenda items are to be submitted at
least 5 days prior to each Conference